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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **OAKLAND DIVISION**

13 ROXANA DEL TORO LOPEZ and ANA
14 MEDINA, on behalf of themselves, and all
others similarly situated,

15 Plaintiffs,

16 v.

17 UBER TECHNOLOGIES, INC.,

18 Defendant.
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Case No. 4:17-cv-06255-YGR

**SUPPLEMENTAL DECLARATION OF
JENNIFER M. KEOUGH
REGARDING ADMINISTRATION
AND FUND B CLAIMS SCORING**

1 I, JENNIFER M. KEOUGH, declare and state as follows:

2 1. I am Chief Executive Officer at JND Legal Administration (“JND”). The following
3 statements are based on my personal knowledge and information provided to me by other JND
4 employees working under my supervision and, if called on to do so, I could and would testify
5 competently thereto.

6 2. JND is serving as the Settlement Administrator in the above-captioned litigation
7 (“Action”) for the purposes of administering the parties’ First Amended Collective, Class Action and
8 PAGA Representative Action Settlement Agreement (“Settlement Agreement”), preliminarily
9 approved in the Court’s Order dated April 19, 2018.

10 3. JND is a legal administration services provider with its headquarters in Seattle,
11 Washington. JND has extensive experience in all aspects of legal administration and has
12 administered settlements in hundreds of cases.

13 4. This Supplemental Declaration updates the Declaration of Jennifer M. Keough
14 executed August 17, 2018.

15 **OBJECTIONS**

16 5. The Notice informed Class Members that any Class Member who wanted to object to
17 or comment on the approval of the Settlement could do so by submitting a written statement. Class
18 Members had until September 10, 2018 to submit an objection or comment.

19 6. JND has not received any objections to any aspect of the Settlement, including the
20 Fee Motion, and JND is not aware of any objections.

21 7. One comment in support of the Settlement was submitted to the Court, and is
22 available at ECF No. 65.

23 **REQUESTS FOR EXCLUSION**

24 8. The opt-out deadline for Class Members who did not submit a Fund B Claim Form
25 was July 9, 2018. The opt-out deadline for Class Members who did submit a Fund B Claim Form
26 was September 10, 2018. As of the date of this declaration, JND has received four requests for
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1 exclusion, two of which were subsequently rescinded. The remaining two exclusion requests were
2 timely and properly complied with the Settlement Agreement requirements.

3 9. Both of the two valid exclusion requests were from Class Members who did not
4 submit a Claim Form. As of the date of this declaration, no Class Member who submitted a Claim
5 Form has requested to be excluded from the Settlement.

6 10. JND has not received any other opt-out requests.

7 **OTHER COMMUNICATIONS**

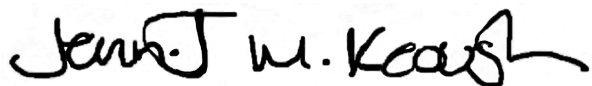
8 11. JND has received no additional calls from Class Members, and the website
9 www.UberSWESettlement.com has received 357 additional unique visitors and 1,502 additional
10 pageviews, since my declaration executed on August 17, 2018, in which I stated that JND had
11 received 19 calls from Class Members, and that the website had received 752 unique visitors and
12 2,757 pageviews.

13 **JND'S WORK ON THE SETTLEMENT**

14 12. I and other JND employees spent substantial time administering the notice program,
15 responding to Class Member questions, and evaluating and scoring Claim Forms, among other
16 activities, and will spend significant additional time processing payments, responding to Class
17 Member questions, and calculating and communicating the tax withholdings for each Class Member.

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19 I declare under the penalty of perjury pursuant to the laws of the United States of America and
20 the State of Washington that the foregoing is true and correct.

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22 Executed on October 19, 2018, at Seattle, Washington.

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25 JENNIFER M. KEOUGH